

# Draft Business Plan for Guffey Gorge Day-Use Area

**PENDING REVIEW BY RESOURCE ADVISORY COUNCIL  
AND FEDERAL REGISTER NOTICE**



**United States Department of the Interior  
Bureau of Land Management, Colorado  
Front Range District  
Royal Gorge Field Office  
August 2015**



# Draft Business Plan for Guffey Gorge Day-Use Area

## RECOMMENDATIONS, REVIEWS, AND APPROVALS

Recommended by:

\_\_\_\_\_  
Outdoor Recreation Planner

\_\_\_\_\_  
Date

Reviewed by:

\_\_\_\_\_  
Recreation Division Chief

\_\_\_\_\_  
Date

Approved By:

\_\_\_\_\_  
Field Office Manager

\_\_\_\_\_  
Date

This business plan was prepared pursuant to the Federal Lands Recreation Enhancement Act (Public Law 108-447) and BLM recreation fee program policy. It establishes future management goals and priorities for the recreation fee program for Guffey Gorge standard amenity fee site.



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
ROYAL GORGE FIELD OFFICE  
3028 East Main Street  
Cañon City, CO 81212



In Reply Refer to:  
8300 (COF020, LS)

Dear Reader,

The Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO) recently approved the Guffey Gorge Management Plan which included the decision to implement a fee program at the Guffey Gorge Day-Use Area. This document, the *Draft Business Plan for Guffey Gorge Day-Use Area*, details the estimated costs associated with developing and operating this area as a standard amenity recreation site, and the proposed fee that would be charged to users to offset these costs. Also included in this document are the authorities and regulations that allow the BLM to collect recreational fees.

The proposed fee implementation would occur on May 1, 2017. Guffey Gorge would be established as a standard amenity recreation site and would charge \$6.00 per vehicle per day for day use. The fee would be in effect between May 15 and September 30.

The objective of the *Draft Business Plan for Guffey Gorge Day-Use Area* is to provide you with the opportunity to submit comments pertaining to the level of fee to be charged and any other issues we have raised or that you may feel are important.

Comments may be mailed to "BLM, Guffey Gorge Business Plan Comment, 3028 East Main Street, Cañon City, CO 81212" or email to [rgfo\\_comments@blm.gov](mailto:rgfo_comments@blm.gov) (subject line: "Guffey business plan"). Comments are due by XXX date. Thank you for your interest in your public lands.

Sincerely,

Keith E. Berger  
Field Manager  
Royal Gorge Field Office

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# Draft Business Plan for Guffey Gorge Day-Use Area

## Introduction

Guffey Gorge Day-Use Area also referred to as Paradise Cove, is a popular cliff jumping and swimming hole located along Colorado's Front Range (Map 1). Tucked within a rural, agricultural setting, Guffey Gorge is an 80 acre parcel of land within the Bureau of Land Management (BLM) Front Range District's, Royal Gorge Field Office (RGFO). The site is surrounded by private land with Park County Road (CR) 102 providing legal access. Visitation has increased to levels that impact the physical resources, negatively changed the visitor experience, in addition to increasing the cost of monitoring the area. The Guffey Gorge Management Plan Environmental Assessment (EA), DOI-BLM-CO-200-2013-0040 EA, analyzed alternatives to address resource concerns and solicited input from the public. This EA was finalized in June 2015 along with the RGFO's decision to authorize the Proposed Action that includes the addition of supplemental rules to ban alcohol, enhance visitor services and facilities and implement a fee program.

The BLM originally began collecting recreational fees for the use of public lands under the authority of the Federal Lands Policy and Management Act of 1976 (FLPMA). The Federal Lands Recreation Enhancement Act of 2004 (FLREA) provides the BLM with its current authority to collect fees for short-term use of recreation facilities. The act authorizes the BLM to locally retain collected recreation fees and outlines how revenues may be used, for such things as facility repair, facility maintenance, facility enhancement, interpretation, visitor information, visitor services, visitor needs assessments, signs, habitat restoration, law enforcement related to public use and recreation, and supplement appropriated revenue funded operating and capital costs directly associated with the Recreation and Visitor Services Program.

Fees are a way of ensuring that those who actively use recreation opportunities make a greater, but reasonable, contribution toward protecting and enhancing those opportunities than those who do not.

BLM guidelines require that each recreation fee program have a business plan which thoroughly discusses fees and explains how fees are consistent with the criteria set forth in FLREA and other agency directives. Business plans assist management in determining appropriate fee rates, outline the cost of administering fee programs, and identify priorities for future fee program expenditures. The primary purpose of the plan is to serve as public notification of the objectives for use of recreation fee revenues and to provide the public an opportunity to comment on these objectives. The *Draft Business Plan for Guffey Gorge Day-Use Area* is subject to public review and comments will be considered prior to instituting a fee program.

## Background and Authorities

The authorities and regulations for this business plan are:

- **The Federal Land Policy and Management Act of 1976** (Public Law 94-579), contains BLM's general land use management authority over the public lands, and establishes outdoor recreation as one of the principal uses of those lands. Section 302 (b) of FLPMA authorizes the BLM to manage the use of the public lands through permits.
- **The Federal Lands Recreation Enhancement Act of 2004** (Public Law 108-447), repealed applicable portions of the Land and Water Conservation Fund Act and replaced BLM's authority to collect recreational fees. This law authorizes the BLM to collect recreation fees at sites that meet certain requirements, allows the BLM to keep the fee revenues at the local offices where they are collected, and directs how the BLM will manage and utilize these revenues. Section 803 contains BLM's authority to issue recreation use permits and charge a permit fee for use of the Guffey Gorge Day-Use Area. Section 803(f) defines the criteria that must be met in order to charge a standard amenity recreation fee.

This business plan has also been prepared pursuant to all applicable BLM recreation fee program policies and guidance, including:

- BLM Recreation Permit and Fee Administration Handbook (H-2930-1), explains how the BLM implements its recreation permit and fee program. Chapter 2 specifically addresses Recreation Use Permits and the use of fees. BLM Colorado Instruction Memorandum CO 2012-001: BLM Colorado Recreation Fee Proposals, Step-by-Step Review and Approval Process and Checklist for Resource Advisory Committee Fee Review
- 43 CFR 2930
- BLM Manual 2930, Recreation Permits and Fees

The BLM strives to manage recreation and visitor services to serve diverse outdoor recreation demands while also conserving public lands so the visitor's desired recreation choices remain available. The BLM's goals for delivering recreation benefits from BLM-administered lands to the American people and their communities are:

- Maintain public access and provide needed public services; recreation opportunities; and enjoyment of natural resources while maintaining sustainable healthy ecosystems;
- Enhance public lands to ensure a quality experience while satisfying recreation demand within allowable use levels and minimizing user conflicts;
- Use best business practices to provide for and receive fair value in recreation.

This business plan will assist the Royal Gorge FO in meeting these recreation and visitor service goals in the Guffey Gorge Day-Use Area.

## **Recreation Overview and Applicable Plans**

Outdoor recreation is a primary driver for Colorado's economy. According to the Outdoor Industry Association, at least 65% of Colorado residents participate in outdoor recreation each year. In 2011, consumer spending reached \$13.2 billion, generating \$994 million in direct state and local tax revenue. Additionally, tourism employs more than 150,700 people in the state.<sup>1</sup>

The state of Colorado has committed to responsibly grow the recreation economy by creating the Colorado Outdoor Recreation Industry Office in June 2015. This office was established in recognition of the huge impact and importance of the recreation industry to the future prosperity and health of Colorado.

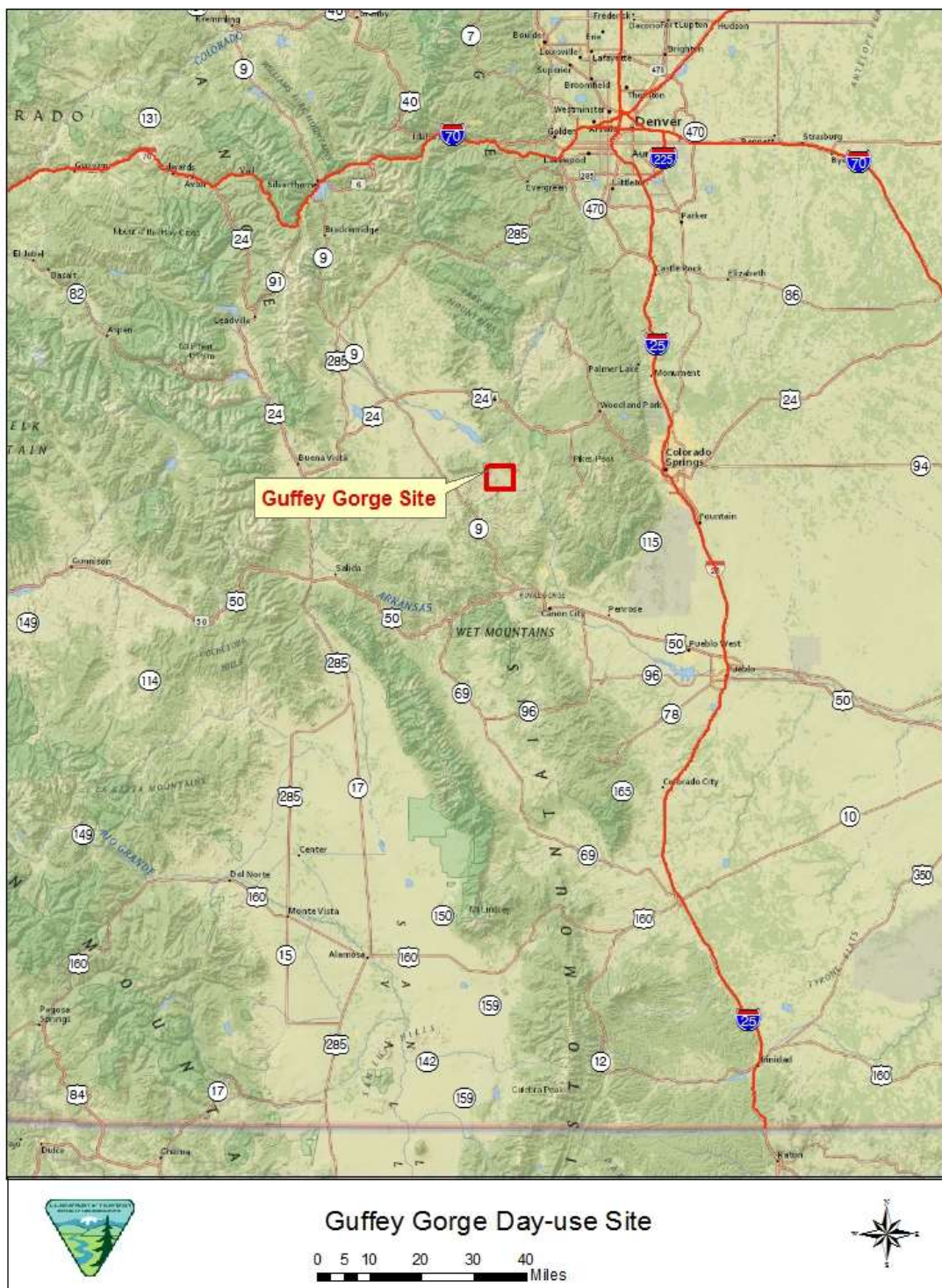
At the national level, the direction of the BLM recreation program has shifted from an "activity based" approach to one that focuses on sustainable recreation opportunities with social and economic benefits to local communities and the nation. The RGFO is a component of BLM Colorado's Front Range District, and is the administrative unit responsible for approximately 653,000 surface acres of public lands in eastern Colorado. Considering the RGFO management area includes the population centers of Denver and Colorado Springs, some BLM areas have become inundated with visitation. Guffey Gorge is one of the areas that has been discovered and receives increasing visitation annually.

Over time, various management actions in Guffey Gorge have occurred based on decisions outlined in the Approved Resource Management Plan (RMP) signed in May 1996. Guffey Gorge is located within the Gold Belt Sub region where specific decisions were defined for the recreation program including: Decision number 5-90 "Various actions will occur to enhance recreation: upland recreation opportunities emphasizing a balance between resource protection and tourism; coordination with various volunteer and user groups; monitoring and visitor contacts to ensure visitor safety, resource protection, and visitor information availability."

The Guffey Gorge Use Restrictions and Motorized Vehicle Barriers Environmental Assessment (EA), (#CO-200-2005-0096 EA) and the corresponding Decision Record (dated 12/15/05) authorized a set of management actions intended to protect the resources within Guffey Gorge. These management actions included changing recreational use to "day use only", restrictions to parking and the addition of supplementary rules that applied to the entire 80 acre parcel.

The Guffey Gorge Management Plan DOI-BLM-CO-200-2013-0040 EA, and the corresponding Decision Record signed on June 29, 2015, defines the management direction for recreation visitation at Guffey Gorge. The Decision Record authorizes the implementation of a fee at the Guffey Gorge Day-Use Area to off-set costs of other management strategies such as enhanced amenities and monitoring.





Map 1 Overview location of Guffey Gorge, 80 acre site within the RGFO



## Description of Guffey Gorge Day-Use Area

Guffey Gorge Day-Use Area is an 80 acre parcel of land located within an hour drive of Colorado's Front Range. The day-use area is managed by BLM's RGFO. Park County Road (CR) 102 provides legal access to the parking area. A short ten minute walk with three creek crossings and a trek over a steep hill drops the visitor into a secluded waterhole fed by Fourmile Creek (Figure 1, 2). The swimming hole is less than one quarter of an acre and surrounded by rock walls.



**Figure 1 Fourmile Creek**

Many visitors consider Guffey Gorge a unique recreation opportunity in a relatively primitive natural environment. The general parcel sees a variety of dispersed recreation activities such as swimming, cliff jumping, bird watching, hiking, rock climbing and sight-seeing. The current recreation site is day use only and provides parking for fourteen vehicles, an informational kiosk, portable toilets, trash service and a primitive trail accessing the area. A second informal parking area has been user created with additional space for vehicles.

As identified in the management plan, changes in the current conditions will facilitate a reduction in impacts to resources and improve visitor safety. Additional rules have been approved intending to change the setting and visitor experience with a ban on alcohol and amplified sound

systems. Planned improvements and additions to facilities will qualify the site as a standard amenity day-use area. A fee would be collected to help fund the cost of maintaining

the facilities and providing public health and safety services. The natural setting of the trail leading into the swimming hole would remain similar to its current state. This draft business plan analyzes the costs associated with developing and operating this area as a standard amenity recreation site as well as the anticipated fee revenues.



**Figure 2 Scenic trail through area**

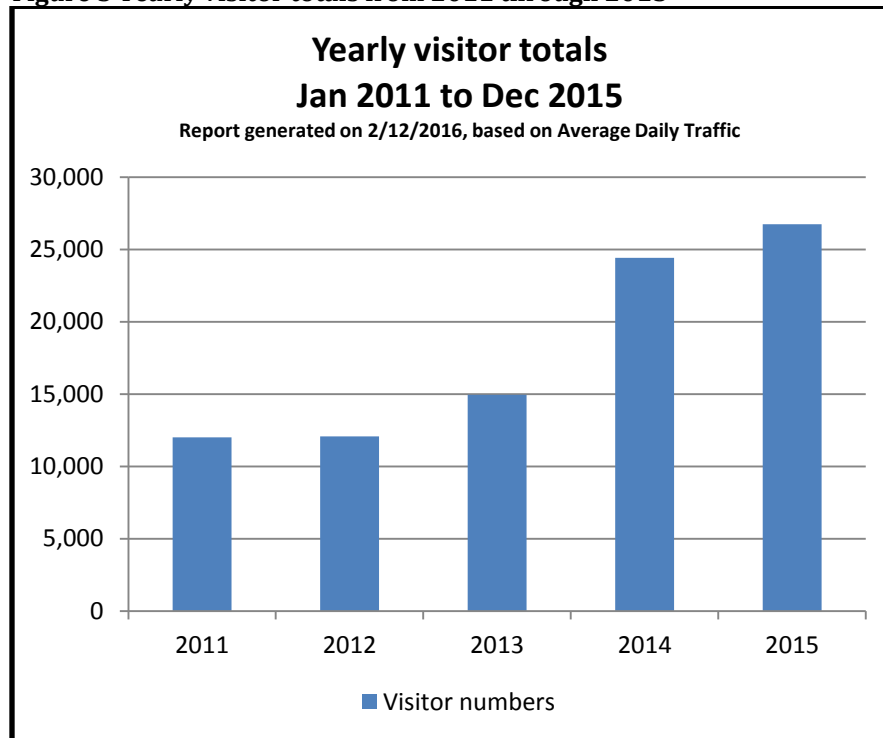


Map 2 Location of developed day-use area includes all 80 acres.

### Recreation Use:

Based on data collected starting in 2011 using a TRAFX infrared counter, it is estimated that, on average, Guffey Gorge sees approximately 18,000 visitors per year (Figure 3).

**Figure 3 Yearly visitor totals from 2011 through 2015**



**Figure 4 Swimming hole**

While a recent visitor survey<sup>2</sup> was completed in 2015 included limited demographics information, staff observations reflect more accurate information because the minimum age required to complete the survey was 18 years old. However the survey results indicate that 67% of the respondents are 18-30 years of age. Group size was recorded as 58% with at least 3 or more visitors. From staff observations and informal interviews, the majority of visitors are between the ages of 16 and 25 and travel from the Front Range urban centers. For these visitors, Guffey Gorge is a destination for a day trip to escape the heat of summer. Group size ranges widely from a single individual to small groups of 3 or 4 to large groups of up to a dozen. Guffey Gorge is often a repeat destination with previous visitors bring new visitors to the site. The length of stay for the average visitor varies from one to 6 hours.

### Partnerships and Volunteer Programs:

The RGFO BLM office has developed a relationship with the newly formed Guffey Gorge Community Group. The BLM plans to work with this community group on future management, funding, maintenance and improvement projects. In the past, local volunteers have assisted with trash pickup and graffiti removal.

## **Operating Costs**

As described and analyzed in the Guffey Gorge Management Plan, the increasing levels of visitation has resulted in increasing pressures and impacts on physical resources as well as increasing incidents related to public health and safety and increasing management costs. The RGFO has already taken some management action to respond to these challenges. As of August 2015, the RGFO has incurred management costs associated with: portable toilets, bear proof trash receptacle, informational kiosk, designated parking, and a minimum of two days of seasonal staff support per week. Law enforcement has also spent numerous hours each week in Guffey Gorge.

The management plan authorized implementation of amenities including services to develop the Guffey Gorge Day-Use Area to meet the description of a standard amenity recreation site. The intent of implementing a standard amenity recreation fee is to enhance visitor experiences, address environmental impacts and manage conflicting uses while users share the costs of managing the recreation site. As described in Section 803(f)(4) of FLREA, a standard amenity recreation fee may be charged in an area of concentrated recreation use:

- that provides significant opportunities for outdoor recreation;
- that has substantial Federal investments;
- where fees can be efficiently collected; and
- that contains all of the following amenities:
  - Designated developed parking.
  - A permanent toilet facility.
  - A permanent trash receptacle.
  - Interpretive sign, exhibit, or kiosk.
  - Picnic tables.
  - Security services.

Table 1 lists the anticipated costs for implementing the management strategies for the Guffey Gorge Day-Use Area.



**Table 1 Projected start-up cost for facility development**

Description	Quantity	Total
Cadastral Survey <sup>1</sup>	1	\$ 10,000
Engineering coordination <sup>2</sup>	120 hours	\$ 7,068
Accounting set up <sup>3</sup>	2 days	\$ 600
CXT Double Restroom (vault toilet)	1	\$ 45,775
Picnic Table	3	\$ 8,016
Parking area construction and materials	1	\$ 70,000
Kiosk –replace with new one	1	\$ 4,000
Bear proof trash receptacle	1	\$ 1,200
Fee collection tube	1	\$ 450
<b>Total Investment</b>		<b>\$ 136,659</b>

<sup>1</sup> Cadastral survey to define boundaries for sign placement

<sup>2</sup> Engineering coordination includes project oversight and design

<sup>3</sup> BLM labor to set up fee collection software

As shown in Table 1, the total development cost for implementing the management strategies authorized in the management plan is approximately \$130,000. This will be funded through community grants, partnership support and base funding.

#### Anticipated Operational Expenses:

To determine anticipated operational expenses, actual expenses were identified over the past five years. Trends from this data were then carried forward and combined with anticipated needs associated with changes in management to determine future estimated operational expenses. From traffic data counters, it was determined that a season is defined by the busiest dates which occur between May 15 and September 30 annually.

#### **Actual/Estimated Expenses; 2011-2015**

Labor costs were calculated based on the estimated number of days the site was monitored by the BLM law enforcement officer, recreation technician, and park ranger (see Table 2). Typically the site was monitored 54 days with an average time of 5 hours including travel. This estimated cost was consistent over the last 5 years at \$7,366.00 annually. Sum of (# of days per season x average hours/day x FY2014 hourly rate cost to government) = estimated patrolling/maintenance costs

**Table 2 Patrol/ Maintenance labor cost**

Personnel	Days	Daily hours	Days*Hours	Hourly Rate	Cost per season
Law enforcement	16	6	96	\$36	\$3,456
Recreation Technician	32	4	128	\$20	\$2,560
Park Ranger	6	5	30	\$45	\$1,350
	54				<b>\$7,366</b>

The total labor estimate for patrol/ maintenance was carried forward into Table 3 and is an estimated cost for 2011 through 2015. All other costs identified in Table 3 are based on actual expenses incurred by the BLM RGFO over the last five years. Patrolling/ maintenance refers to the expense of RGFO staff time at the Guffey Gorge Day-Use Area performing duties such as providing information, monitoring visitation, law enforcement, and conducting maintenance and trash pick-up for existing facilities. Actual vehicle cost to perform patrolling and maintenance needs are listed separately in Table 3.

**Table 3 Actual / Estimated Operation Costs 2011-2015**

	2011	2012	2013	2014	2015
Toilets and trash service	-	-	\$ 3,000	\$ 3,000	\$ 4,425
Law Enforcement Contract <sup>1</sup>	-	-	-	-	\$ 7,500
Patrolling / Maintenance Costs	\$ 7,366	\$ 7,366	\$ 7,366	\$ 7,366	\$ 7,366
Vehicle Cost	\$ 2,940	\$ 2,940	\$ 2,940	\$ 2,940	\$ 2,940
Miscellaneous <sup>2</sup>	\$ 500	\$ 500	\$ 500	\$ 1,000	\$ 1,000
Administrative= 7% <sup>3</sup>	7%	7%	7%	7%	7%
Annual Cost Totals	\$ 10,806	\$ 10,806	\$ 13,781	\$ 14,281.00	\$ 23,231.00
Annual Cost Totals + Indirect	\$ 11,562	\$ 11,562	\$ 14,745	\$15,280.00	\$ 24,857.00

<sup>1</sup> Contributed funds to the Park County Sheriff for law enforcement support

<sup>2</sup> Includes costs of replacement signs, graffiti removal cleaner, trash bags, visitation counters

<sup>3</sup> Administrative cost includes overhead, supervisor check in and other items difficult to track

As shown in Table 3, over the five year period, management costs at Guffey Gorge have increased by nearly 50%. Portable toilet and trash service costs increased in 2015 for three reasons: (1) the toilet rental increased from \$700 to \$850 per month (four month rental), (2) an additional toilet was added, and (3) two months of trash service was added. In addition, in 2015, the BLM contributed funds to Park County Sheriff for support for enforcement of parking or drunken driving enforcement. The change in miscellaneous costs includes design and installation of signs as well as the cost of replacing traffic counters.

Additional costs identified in Table 3 include the cost for government vehicles and equipment used to support patrols, maintenance work, resource and visitor use monitoring and law enforcement.

### **Estimated Future Costs**

Anticipated future annual operating costs include monitoring of visitor use, fee collection, health and safety services, maintenance and cleaning, vault toilet pumping and trash disposal. Additional costs to the government of administering the fee program include managerial support (such as program review), office overhead (such as time to collect and count fees on a weekly basis), and work by recreation planners (such as providing information services to the public and reporting annual funds collected related to cost of services).

As facilities and amenities are added to Guffey Gorge, on-going maintenance will be needed. The provision of one dedicated RGFO recreation employee would help to ensure the cleanliness and safety of the facilities. This position will be responsible for cleaning the facility, maintaining the infrastructure (such as painting toilet buildings and picnic tables), and for construction and maintenance of amenities such as fencing, shade shelters, etc. Grounds maintenance, removal of invasive weeds, and toilet facility cleaning will be undertaken by a RGFO recreation employee or an outside maintenance contractor if it provides the best value. The costs of cleaning and maintaining the toilet facility will include buying toilet paper, garbage bags, and paying for sewage cleaning contracts. Operating costs, including costs of fee collection would be funded through revenue collected from the new standard amenity fees. Labor costs are not expected to change for recreation staff duties. Table 4 identifies anticipated future annual operating expenditures associated with the Guffey Gorge site.

**Table 4 Future Expenses**

	2016*	2017	2018	2019	2020	2021
Vault toilet & trash	\$ 4,425	\$ 4,500	\$4,572	\$4,645	\$4,719	\$4,795
Patrolling / Monitoring / Fee collection	\$ 7,366	\$ 29,800	\$22,000	\$14,400	\$14,400	\$14,400
Vehicle costs	\$ 2,940	\$ 2,940	\$2,987	\$3,035	\$3083	\$3,133
Miscellaneous costs <sup>1</sup>	\$ 1,000	\$ 1,000	\$ 1,016	\$ 1,032	\$ 1,049	\$ 1,065
Administrative = 7%	7%	7%	7%	7%	7%	7%
Annual Cost Totals	\$ 23,231	\$ 38,240	\$ 30,575	\$ 23,112	\$ 23,251	\$ 23,393
Annual Cost Totals + Indirect	\$ 24,857	\$ 40,917	\$ 32,715	\$ 24,730	\$ 24,879	\$ 25,030

<sup>1</sup> Includes toilet paper, fee collection envelopes, etc

\*No changes will be made for 2016. It is anticipated that the expenses will be the same as 2015.

Annual costs were adjusted for inflation using a rate of 1.6%, the national rate of inflation between 2013 and 2014 reported by the Bureau of Labor Statistics.

It is expected that implementing the Guffey Gorge Management Plan will require an increase in BLM staff presence and monitoring. An increase in labor is shown in Table 4 including an extra twenty four hours for a Law Enforcement Officer and additional staff time for patrolling, monitoring and fee collection. Prior to the fee changes, staff time to educate the public as well as new supplementary rules such as banning alcohol will be needed. After the changes are put into place, increased law enforcement patrols will be needed in the first couple of years. This need will be partially met through an agreement with Park County Sheriff for weekly law enforcement patrolling during the summer use season. In addition, BLM may bring in additional law enforcement officers on details. The need of additional staff will be assessed each season and patrols would occur at a lower rate as the public complies with the new rules at the site.

For monitoring, fee collection and maintenance, RGFO will hire a seasonal BLM employee to work at least two days a week at the site, during the four month high use season. An RGFO



permanent recreation staff person would also be needed at the site on a bi-weekly level to assess the management program and perform monitoring of impacts to resources. It is anticipated that labor costs will level off to approximately \$14,400 annually.

Future revenue depends on the number of visitors at the site. The current trend in visitor numbers has increased annually. The BLM anticipates that the number of visitors in the first year will stabilize or decrease slightly with the implementation of supplementary rules and the addition of a fee. As the visitor experience and setting shifts in a more positive direction, the area may encourage more visitations due to the enhanced visitor services and improvements to the resource. Guffey Gorge is within an hour drive of Metro Denver whose population has grown above 3 million people. The increase is anticipated to continue according to Metro Denver Economic Development Corporation.<sup>3</sup> Therefore, the BLM anticipates that the cost of on-going maintenance will also stabilize or increase over time.

## Revenues

Revenue from fee collection was calculated after the collection method was determined. The method of charging a fee per vehicle was the most cost effective and manageable way for the site. Other alternatives are summarized in Appendix A. The fee would be collected between mid-May and the end of September when visitation is the highest. The standard amenity facilities would be maintained during this time-frame. Between October 1 and May 15 fees would not be charged and the facilities could be locked and maintained at a minimal level.

The following table displays anticipated revenue for the first four years. Data for number of visitors in Guffey Gorge was collected with a trail counter that counts individuals walking by the counter. From this data, the average number of individuals per day was derived. Average daily visitation was calculated between May and September and over a 3 year time span from 2011-2013. The average number of individuals visiting Guffey Gorge daily is 98.

Table 5 displays anticipated revenue for the first four years if a fee is charged per vehicle. An average of three visitors per vehicle was assumed, based on staff observations, to calculate the average number of vehicles. This results in an average of 33 vehicles per day.

**Table 5 Revenue if fee charged per vehicle**

	2017	2018	2019	2020
Fee per Day per vehicle	\$6.00	\$6.00	\$6.00	\$6.00
Avg. visitor days, 4 months	134	134	134	134
Vehicles per day	20	25	30	33
Annual Revenues	\$ 16,080.00	\$ 20,100.00	\$ 24,120.00	\$ 26,532.00
Net Gain/ Loss <sup>1</sup>	\$(24,836.80)	\$(12,615.29)	\$ 610.10	\$ 1,652.75

<sup>1</sup> Revenue is subtracted from Table 4 operating costs

With a fee rate of \$6.00 per vehicle the revenue would be approximately \$26,500 per season given full compliance with payments. It is anticipated that the revenue would be lower the first year and gradually increasing as full compliance is reached. The first 2 years are also expected to reflect a loss since law enforcement costs are higher. Subsequent years at \$6.00 per vehicle, the

revenue would cover the operating costs. Any net gain would provide minimal revenue to fund monitoring the site over the remainder of the year and contribute to deferred maintenance funds for future improvements. Prior to the beginning of the fee collection start date in May, some costs would be incurred for preparing the site, hiring a seasonal and buying toilet supplies. Carryover funds would contribute to this yearly startup cost.

## **Priorities for Future Expenditures**

Priorities for future expenditures using revenues generated for fees collected at Guffey Gorge are as follows:

- Provide funding to protect the resources such as trail improvements that decrease erosion and sediment loss into Four mile Creek and improved creek crossings for visitor safety and improved access to the swimming hole;
- Program improvements that benefit visitors and improve BLM operations;
- Encourage partnerships with the community;
- Enhance visitor services by providing matching funds in applying for grants, conduct emergency repairs to site facilities, respond to unanticipated costs to improve services, or funds for future recreation infrastructure such as additional picnic tables or shade structures.

Table 4 shows the estimated annual operating costs for the Guffey Gorge Day-Use Area for fiscal years 2016 through 2020. These estimates assume the initial implementation of the proposed fee will be on May 15, 2017. The estimated revenues (Table 5) would generate around \$27,000 per year.

### Revenues Necessary to Maintain Program Services

Projected expenditures included in Table 3 include only those necessary for continued program operations and minor improvements. The BLM would continue its long term efforts to gradually improve physical facilities at the site through a combination of regular appropriated funds, internal one-time program grants, and expenditure of user fees.

### Maintenance of Fund Account Balance

A positive fund balance generated solely from fee revenues will provide the BLM with the flexibility to continue to provide required services if unforeseen additional demands arise, quickly address threats to public health and safety, and allocate some revenue for future investments in facility infrastructure.

A positive fund balance is necessary for the RGFO to provide operational services to visitors throughout the year. This includes expenditures associated with contracts, agreements, and other purchases as well as labor costs for BLM employees involved with the Guffey Gorge. Given current and projected expenditure levels, the RGFO recommends a minimum balance of approximately \$26,500 to ensure continuity of operations.

## Analysis of Recreation Fee Rates

### Comparable Fee Calculation Method

The Comparable Assessment approach compares the fees charged at similar areas to the Guffey Gorge area and administered by federal and state land management agencies. Table 7 presents fees at various day-use locations.

**Table 6 Comparison of Day-Use Entrance Fees**

Area Name	Agency	Fee(s)	Amenities Offered
<b>Public Day Use areas</b>			
<b>Guffey Gorge Day-Use Area</b>	Bureau of Land Management RGFO	Proposed Fee \$6 per vehicle	Picnic table, toilet, trash service, parking area
<b>Florissant Fossil Beds National Monument</b>	National Park Service	\$3 per individual; under 16 free \$15 annual pass	Day pass, good for 7 days. Annual pass, good for 1 year for cardholder and immediate family.
<b>Eleven Mile Park</b>	Colorado Parks & Wildlife	\$7 per vehicle \$70 annual pass, all CPW parks	Picnic sites, boat ramp access, amphitheater, toilets
<b>Mueller State Park</b>	Colorado Parks & Wildlife	\$7 per vehicle \$70 annual pass, all CPW parks	Picnic sites, toilets, trails
<b>Great Sand Dunes National Park &amp; Preserve</b>	National Park Service	\$3 per individual; under 16 free \$15 annual pass	Picnic tables, toilets, trash service, parking areas, visitor center
<b>Dinosaur National Monument</b>	National Park Service	\$10 per vehicle \$5 per individual with no car \$20 annual pass	Visitor center, trails, Picnic sites
<b>Cheyenne Mountain State Park, Colorado Springs</b>	Colorado Parks & Wildlife	\$7 per vehicle \$70 annual pass, all CPW parks	Picnic sites, visitor center, trails
<b>Cleveland Lloyd Dinosaur Quarry</b>	BLM Utah, Price Field Office	\$5 per adult, youth under 16 are Free	Museum, trails, picnic tables

The services and facilities provided at many of the day use areas listed above are similar to those offered at a standard amenity recreation site such as Guffey Gorge. Most of the comparison areas are managed by Colorado Parks & Wildlife (CPW) and charge a standard fee of \$7 per vehicle in all parks across the state. Some of the day-use areas listed in the table are highly developed with visitor centers and developed trails. Guffey Gorge would not be developed to this level and the fee associated with the use would be at a lower daily rate compared to these sites. The addition

of a fee in Guffey Gorge would, over time, generate 100% of the revenues needed to cover the program's full operating costs.

In addition to the fee amount, the RGFO considered different methods of fee collection. If an individual fee were collected, permits would need to be issued per person. The challenge of implementing and monitoring an individual fee collection would unlikely outweigh the advantage of tracking the number of visitors to the site.

An alternate method of fee implementation would be to charge a fee per vehicle. This method of fee collection is already being used at the campgrounds in the RGFO. Visitors would place the fee in an envelope and deposit it in a fee collection tube. This payment method would depend on the honor system since staff is not on site on a daily basis. The least amount of staff time required for fee collection is preferred and that is accomplished with the fee charged per vehicle.

## **Public Outreach**

Prior to increasing fees, the RGFO is conducting the following outreach efforts to notify the public of its opportunity to review and comment on the proposal to implement a fee at Guffey Gorge Day-Use Area:

- Posting the Draft Business Plan on the BLM Colorado and Royal Gorge FO websites;
- Publishing a news story in the various newspapers along the Colorado Front Range;
- Issuing a News Release to statewide print and broadcast media.
- Posting notices on Guffey Gorge information kiosk.

In addition, the Royal Gorge FO will be presenting the fee proposal to the BLM Recreation Resource Advisory Council (RAC) for its formal review. The Colorado Front Range RAC is a 15-member advisory panel which provides advice and recommendations to the BLM on resource and land management issues for public lands in Colorado. The Federal Lands Recreation Enhancement Act mandates that the appropriate Recreation RAC reviews all BLM recreation fee proposals prior to approval. Comments from the public at large are included in Appendix B of the business plan. Comments from the BLM Colorado RAC will be considered prior to approval of the fee implementation in the Guffey Gorge Day-Use Area.

## **Royal Gorge FO Recommendation**

After careful consideration of the fee calculation process and the anticipated revenues and expenditures outlined in the *Guffey Gorge Day-Use Area Business Plan*, the BLM Royal Gorge FO recommends implementing the following fee:

### **\$6.00 per vehicle between May 15 and September 30 annually**

As a standard amenity site within the National System of Public Lands, the area fees would be waived on dates specified as fee-free days by the Department of the Interior. All Federal

Recreational Lands Passes will be accepted and discounts registered on the fee envelope. There will not be an annual pass offered at the site.

## **Appendix A Alternative methods of fee collection considered**

Possible fee collection methods considered are: charge a fee per vehicle (as summarized in the revenue section above, charge per individual or a combination of the vehicle and individual fee. Table 6 displays estimated revenue for the first four years if a fee is charged per individual. Approximately \$26,000 per season is needed to cover costs (table 3) and to meet this cost, a fee of \$2.00 per individual would be necessary. Over time this fee would provide minimal revenue to fund monitoring the site over the remainder of the year.

**Table 7 Revenue if fee charged per individual**

	2017	2018	2019	2020
Fee per Day per individual	\$2.00	\$2.00	\$2.00	\$2.00
Ave. visitor days, 4 months	134	134	134	134
Individuals per day	98	98	98	98
Annual Revenues	\$ 26,264.00	\$ 26,264.00	\$ 26,264.00	\$ 26,264.00
Net Gain/ Loss	\$(14,652.80)	\$(6,451.29)	\$1,533.90	\$1,384.75

If an individual fee were collected, permits would need to be issued per person. Law enforcement would need to hike into the swimming hole to check visitor passes increasing the time spent on monitoring. The challenge of implementing and monitoring an individual fee collection would unlikely outweigh the advantage of tracking the number of visitors to the site.

Another method considered was a combination of a fee charged per vehicle with a cap on the total individuals per vehicle. Extra visitors in the vehicle would pay an extra fee. An individual fee could also be charged in the case where visitors were dropped off or rode a bicycle to the site. It is assumed that this would not normally occur because of the remote location of the site.

Another method of fee implementation would be to charge a fee per vehicle. This method of fee collection is already being used at the campgrounds in the RGFO. Visitors would place the fee in an envelope and deposit it in a fee collection tube. With the fee charged per vehicle it would be difficult to limit the number of people per vehicle, however the number of vehicles can be limited by the number of parking spaces provided and strict enforcement of parking along the road. This method takes less time for law enforcement to check since the vehicle parking is at the road.

All of the payment methods described would depend on the honor system since staff is not on site on a daily basis. The least amount of staff time required for fee collection is preferred and that is accomplished with the fee charged per vehicle.

## Appendix B Public Comment Summary

The Guffey Gorge Business Plan comment period was open from April 19 to May 13, 2016. Twelve total comments were received with an additional phone message from a number that couldn't be contacted. Five commenters support the plan and three did not support charging the fee.

Guffey Gorge Business Plan comment period open 4-19 to 5-13, 2016			
Commenter	Date received	Comment	Response
August Bauby	5-6-16	Supports.	n/a
Bill Betz	4-22-16	Supports.	n/a
Michelle Disque	5-11-16	Opposed to plan, close area	Comment is related to the Guffey Gorge Management Plan (DOI-BLM-CO-200-2013-0040 EA), not the business plan.
Steve Irelan	5-5-16	Offers to help, remain the way it is	n/a
Kelly McConnell	5-6-16	Suggests limiting numbers	Comment is related to the Guffey Gorge Management Plan (DOI-BLM-CO-200-2013-0040 EA), not the business plan.
Kathleen McCormick	5-7-16	Supports fee.	n/a
Miranda	5-5-16	Opinion is to keep it free	n/a
Jacob Renfro	5-7-16	Supports keeping it clean and as is, does not support fee	Comment is related to the Guffey Gorge Management Plan (DOI-BLM-CO-200-2013-0040 EA).
Carol Todd	5-6-16	Supports increasing fee to \$10.	BLM recommends a fee of \$6 per vehicle as justified in the business plan.
Keith Upchurch	4-21-16	Main point supports having a place for kids to go	n/a
Kitty Benzar Western Slope No Fee Coalition	5-12-16	The need for adding permanent toilets and picnic tables near the parking is not established. The site is popular for its primitive trail to a backcountry swimming hole, not as a destination picnic site. The agency's desire to do whatever it takes to make this a fee site is driving the process, not any documented public demand.	The need for providing toilets and improved parking is driven by the number of visitors coming to the site as identified in the 2015 Guffey Gorge Management Plan (DOI-BLM-CO-200-2013-0040 EA). In 2015, the number of visitors reached 26,000 with only 2 portable toilets and a trash dumpster provided. These amenities were heavily used by visitors to the site. The physical location of the swimming hole does not allow for placement, maintenance or pumping of a toilet at the swimming hole. The parking area is the only location that these facilities can be placed.
Kitty Benzar Western Slope No Fee Coalition	5-12-16	The proposed "improvements" don't make economic sense. The \$45,775 cost of installing a permanent toilet could cover more than ten years of seasonal portable toilet rental and trash	\$77,000 of the total proposed investment of \$136,659 covers the hardening and alignment of the parking area and engineering cost of oversight. This project will reduce erosion and

		<p>service. In addition, because the toilet would be closed and locked most of the year it is likely to become a target for vandals, rodents, and other damage and will just end up adding to the BLM's maintenance backlog. At a site with such a limited season in a remote location, providing portable toilets and trash receptacles during the high season and removing them the rest of the time makes more sense than installing permanent facilities. The total proposed investment of \$136,659 could cover 5.5 years of operating expenses at current levels. These "improvements" are being proposed solely to justify charging a standard amenity fee, they cannot be justified on economic grounds.</p>	<p>impacts to water quality as well as improve visitor safety for ingress and egress. This improvement is necessary whether or not other amenities are installed. Another portion totaling \$10,000 was required to mark the boundary between BLM and private land due to numerous trespass issues and would have been done whether or not other amenities are installed. The \$45,775 cost to install a permanent toilet could cover ten years of service for a portable toilet, however, the BLM is charged with managing this site in perpetuity, not only for a ten year period. It is true that the \$45,775 could be invested in supplying portable toilets for the next ten years with the expense continuing after that time. By investing the funds into vault toilets early, only maintenance cost would continue. Further, outside funding sources are also being pursued to offset the initial investment costs to taxpayers including grants and partner contributions. Not having the restroom open during the off-season is seen as a strategy to reduce overall maintenance costs and high levels of vandalism or damage are not anticipated due to its location and visibility along a major county road.</p>
Kitty Benzar Western Slope No Fee Coalition	5-12-16	<p>A per vehicle enforcement system does not address the problems occurring at the site, such as alcohol and loud music. These are associated with the swimming hole, not the parking lot, so that's where enforcement should be focused.</p> <p>The plan proposes charging per-vehicle because law enforcement can be accomplished by walking around the parking lot checking fee compliance, but there is no correlation between paying fees and good or bad behavior. Are alcohol fueled rowdy behavior and loud music acceptable as long as the fee was paid?</p> <p>Are people who are willing/ able to pay less likely to cause a nuisance? The solution does not match the problem.</p>	<p>The alcohol and loud music problems are addressed separately through the Guffey Gorge Management Plan ((DOI-BLM-CO-200-2013-0040 EA) proposed supplemental rules (FRN 81 35039). The rules include an alcohol ban and a ban on amplified sound. These rules cover the entire 80 acre site and will be enforced at the swimming hole and the parking area. The fee will be enforced at the parking area as stated.</p>
Kitty Benzar Western Slope No Fee Coalition	5-12-16	<p>Revenue projections are artificially high. The revenue projections assume that every vehicle will be paying the fee, even though Federal Recreation</p>	<p>The projected revenues in the business plan are estimates based on current visitation levels and do not account for Federal Recreation Passes. The BLM</p>



		<p>Passes will be accepted. There is no adjustment for how many people will use passes purchased elsewhere and thus not contribute to the cost of operating Guffey Gorge. In comparing the proposed fee to other sites, several NPS units and one BLM standard amenity fee site are included but without any analysis of how many people visiting those places use passes, which can be quite a substantial number. Several NPS units around the country have in fact stopped collecting an entrance fee because so many visitors have passes that it costs more to administer the fee than it brings in.</p>	<p>recognizes that some of the visitors to the site may use a Federal Recreation Pass, however, the overall number is anticipated to be low due to the demographics of visitors who are younger and do not typically purchase passes. Additionally, portions of revenue from Federal Recreation Passes sold at the Royal Gorge Field Office or the BLM Colorado State Office could be available for use at the site and would compensate for the number of passes used at the site.</p>
Kitty Benzar Western Slope No Fee Coalition	5-12-16	<p>The fee at Gunnison Gorge Wilderness is included as a comparable, but it is not a standard amenity fee.</p>	<p>This is correct; Gunnison Gorge Wilderness is an Individual Special Recreation Permit and was removed from the final document. Upper Colorado River was also removed because it is an expanded amenity fee site.</p>
Alan Stuter	5-8-16	Supports.	n/a
Mark	5-9-16	Could not return call with phone number left.	n/a

## References

<sup>1</sup> Outdoor Industry Association webpage (2015) Outdoor Industry Association—annual report: “The Outdoor Recreation Economy” Annual Report  
<https://outdoorindustry.org/research-tools/outdoor-recreation-economy/>

<sup>2</sup> Washington State University, 2015, Guffey Gorge/Paradise Cove Visitor Survey, Pullman, WA: Washington State University, report prepared by the Social and Economic Sciences Research Center for the Bureau of Land Management, US Department of the Interior

<sup>3</sup> Metro Denver Economic Development Corporation (2015)  
<http://www.metrodenver.org/do-business/demographics/population/>